

PREA AUDIT: AUDITOR'S SUMMARY REPORT ADULT PRISONS & JAILS

☐ INTERIM ☒ FINAL

NATIONAL
PREA
RESOURCE
CENTER



BJA
Bureau of Justice Assistance
U.S. Department of Justice

AUDITOR INFORMATION			
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Dates of on-site audit:	July 13-15, 2015		
FACILITY INFORMATION			
Name of Facility:	Cambria County Prison		
Physical Address:	425 Manor Dr. Ebensburg, PA 15931		
Facility Mailing Address:	Same		
Telephone number:	(814) 472-7330		
This Facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input checked="" type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for Profit
	<input type="checkbox"/> Private not for Profit		
Facility Type:	<input checked="" type="checkbox"/> Jail	<input type="checkbox"/> Prison	
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AGENCY INFORMATION			
Name of Agency:	Cambria County Prison		
Governing Authority or Parent Agency:	Cambria County Prison Board		
Address:	425 Manor Dr. Ebensburg, PA 15931		
Telephone Number:	(814) 472-7330		
AGENCY CHIEF EXECUTIVE OFFICER			
Name:	John J. Prebish, Jr.	Title: Warden	
Email Address:	jprebish@co.cambria.pa.us	Telephone: (814) 472-1351	
AGENCY WIDE PREA COORDINATOR			
Name:	Not Applicable	Title: Not Applicable	
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NARRATIVE: The Cambria County Prison is a secure 495 bed facility for male and female inmates. The on-site portion of the PREA Audit took place July 13-15, 2015 and covered the audit period of July 13, 2014 to July 13, 2015. On the morning of July 13, 2015 this auditor entered the facility for purposes of conducting an on sight tour of the facility and interviewing inmates, staff, volunteers and contractors. The facility provided a list of all staff by shift and employee job categories and a list of all inmates by housing unit. Prior to arrival this auditor reviewed pertinent agency policies, procedures, and related documentation used to demonstrate compliance with the Prisons and Jails PREA Standards. The pre-audit review of documents contained in the Pre-Audit Questionnaire submitted by the facility prompted few questions. Answers to those questions were submitted to this auditor by the facility staff and any additional remaining questions were resolved during the audit. This auditor interviewed 20 inmates, including all four youthful inmates housed at the facility. The inmates interviewed were a representative sample from each of the seven housing units. Length of stay for those interviewed ranged from one to fourteen months. There were no inmates who identified themselves as transgender or intersex and no inmates who needed translation services. No inmates had specifically requested to speak with this auditor nor had this auditor received any written correspondence from inmates or staff. There were no inmates currently in the facility that made an allegation of sexual abuse or sexual assault.

During the tour, additional questions were answered by executive and upper-level management staff. This auditor was given free access to all areas of the facility. The tour covered all housing units, recreation areas, food service, building and grounds maintenance, segregation, medical, mental health and inmate services. Staff and inmate interviews followed and were conducted privately in a room without video surveillance. There are no SANE or SAFE staff employed at the facility. These services are available at the local hospital (Conemaugh Memorial Medical Center). A Memorandum of Understanding (MOU) is in place with Victims Services Inc. of Cambria and Somerset Counties. This auditor interviewed members of the incident review team and the one of the staff members charged with monitoring retaliation. Administrative investigations are conducted by the Security Captain who has completed the National Institute of Corrections PREA Investigator Training and criminal investigations are conducted exclusively by the Cambria County District Attorney's Office detectives. There were no volunteers interviewed as none were at the facility or available during the audit. Contract medical and mental health staff were interviewed. The agency Executive Director (the Warden) was interviewed by this auditor.

DESCRIPTION OF FACILITY CHARACTERISTICS: The Cambria County Prison is a 475 bed secure facility for male and female inmates at all levels of security operated under the authority of the Cambria County Prison Board. The facility is comprised of a single brick and mortar structure. The building was purpose-built as a prison in 1995. The modern design offers excellent sight lines throughout the housing units. There are eight distinct cell-blocks. There are two dormitory style cell blocks and five cell blocks with a combination of double and single cells. One of the five cell blocks with single and double cells is for female inmates. All cells have toilets and sinks. Showers are single user stales that are situated within the cell block to facilitate appropriate supervision and maintain safety without sacrificing the inmate's privacy. One of the eight cell-blocks is divided into three separate housing units (youthful inmates, quarantine and segregation) which are completely sight and sound separated.

The youthful inmate housing unit consists of eight single wet cells arranged in two tiers (four up and four down). There is also a single stale shower located on each tier. The outdoor recreation area, while shared with the quarantine unit and segregation unit, is sight and sound separated from the housing

units. As previously reported, the youthful inmate housing unit is completely sight and sound separated from the other inmates. There were four youthful inmates at the facility on the first day of the audit.

The quarantine unit is used to house inmates newly arrived to the facility. Initial screening, classification, medical and mental health assessments and/or examinations are conducted on this unit. Inmates remain on the quarantine unit until cleared by each specialty.

There were a total of 475 inmates at the facility on the first day of the audit.

The Cambria County Prison maintains 24 hour supervisory coverage (Lieutenant or higher) as well as an On-Call Administrator.

SUMMARY OF AUDIT FINDINGS: Auditor arrived at the facility the morning of July 13, 2015. An entrance meeting was held with Warden, two Deputy Wardens, Security Captain (who also serves as the PREA Compliance Manager) and this auditor.

A complete tour of the facility took approximately two hours. All areas were extremely well maintained. The facility has a video surveillance system which provides coverage for 95% of the facility. The system provides coverage of the recreation areas, food service, all housing units, hallways and education areas. There are no cameras in the inmates' cells. Cameras on the housing units do not have a view of the rear of the cells (where the toilets are located). Cameras can only view the inmate's head while in the shower. There is a camera view of all doors in areas where inmates are permitted. The camera system has a 45 day retention time for recorded images. Cambria County Prison is in the process of upgrading its camera system, changing out DVR's for NVR's and adding 16 additional cameras.

Sight lines were excellent in all housing areas. Information on reporting sexual violence and available services was prominently posted on all housing units. The audit notice was posted on all housing units, the main entrance to the facility and the inmate visitors waiting area.

Inmates were observed at recreation, during movement, work details (inside and outside the facility) and on the housing units. Observations of staff supervision practices were consistent with the agencies policies. Observed interactions between staff and inmates were professional, respectful and boundary appropriate.

The PREA screening for risk of sexual victimization and/or propensity to victimize is conducted by medical staff on the date of admission, and documented in the inmate management system. All inmates interviewed acknowledged being screened on the date of admission as well as being seen by medical staff on the date of admission. A complete classification assessment is completed by a Counselor from Inmate Services within 48 hours of admission. Both the screening and classification are performed using an objective, standardized instrument.

Administrative investigations regarding allegations of sexual harassment and sexual abuse are conducted by the Security Captain who has received specialized training for investigators of sexual abuse in correctional settings. A review of investigators' reports confirmed an aggressive and thorough investigation into all allegations of sexual harassment and sexual abuse. Criminal investigations of sexual abuse and assault are conducted by detectives from the Cambria County District Attorney's Office. Email contact with the District Attorney's detectives confirmed that there were four incidents of

sexual abuse investigated during this audit period. An MOU is in place to provide crisis counseling and victims' services. Forensic examinations and evidence collection would be performed at the Conemaugh Memorial Medical Center (a SANE hospital).

This auditor interviewed the following staff titles (number in parentheses indicates more than one staff in that title was interviewed):

- Warden
- Mental Health Clinician
- Deputy Warden (2)
- Security Captain
- Lieutenant (Shift Supervisor)
- Nurse
- Vice President Prime Care Medical (Medical Director)
- Facility PREA Compliance Manager
- Corrections Officer I (10)

Random Corrections Officers were selected for interviews to include staff from all housing units. Experience levels ranged from one to over 24 years. All presented as very knowledgeable about their jobs and highly dedicated to keeping inmates and the community safe. All staff acknowledged receiving PREA training within the past year and over the course of their careers a significant amount of training related to cultural sensitivity, professional ethics and reporting responsibilities.

All staff members knew their responsibilities as related to mandatory reporting of allegations of sexual abuse, assault and harassment. All staff acknowledged having received PREA specific training as first responders and all knew what to do if they were a first responder. All Corrections Officers and supervisors interviewed were readily able to articulate their first responder duties. All felt supported by facility management, and had no fear regarding retaliation for reporting abuse. All felt empowered to proactively address issues related to sexual violence and were able to describe actions they would take to prevent and/or deter potential and/or imminent threats of sexual violence.

A total of 20 inmates at the facility were interviewed, and included inmates from all housing units. All four youthful inmates at the facility were interviewed. Ages ranged from 16 to 55 years. There were no inmates currently at the facility that had made an allegation of assault. There were no inmates currently at the facility who identified as transgender or intersex or that had been identified as gender non-conforming in appearance. All inmates acknowledged being asked about sexual orientation upon admission. All inmates interviewed had knowledge of the right to be free from sexual abuse, assault or harassment. All inmates were aware of at least two methods for reporting abuse, one of which was anonymous reporting via the inmate telephones. All inmates acknowledged being screened upon admission (initial screening actually occurs on date of admission, which exceeds the standard). 19 of the 20 inmates interviewed acknowledged receiving information upon admission on their right to be free from sexual abuse, assault and/or harassment. All inmates interviewed said they currently felt safe at the facility. Several stated without prompting that sexual violence is not an issue at Cambria County Prison.

The quality and organization of the documentation provided to this auditor was excellent. This auditor received all policies and supporting documentation electronically. The pre-audit questionnaire completed by the facility's PREA Compliance Manager was one of the better ones this auditor I has received. The referenced documents in the questionnaire were provided electronically and properly labeled for easy access.

The organized manner in which the interviews were facilitated by the PREA Compliance Manager made the process go very smoothly with no wasted time in between interviews.

STANDARDS DETERMINATION TOTALS:

Exceeds Standard – 2 (Two) Standards or approximately 5% of total standards.

Meets Standard - 41 (Forty one) Standards or approximately 95% of total standards.

Does Not Meet Standard – 0 (Zero) Standards or 0% of total standards

Standard 115.11 Zero tolerance of sexual abuse and sexual harassment; PREA Coordinator

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 1, clearly articulates the agency's zero tolerance policy. Agency organization chart and chain of command chart clearly depict the role of Security Captain (who by agency policy is the Facility PREA Compliance Manager). Interview with the PREA Compliance Manager confirmed his knowledge of the PREA standards and commitment to the implementation of the PREA standards. Notice of the PREA compliance audit was posted on all housing units and other prominent locations throughout the facility.

Standard 115.12 Contracting with other entities for the confinement of inmates

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 3 clearly require full compliance with the PREA standards as a condition of the contract. The Cambria County Prison does not currently enter into such contracts.

Standard 115.13 Supervision and monitoring

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 3, was reviewed by this auditor. The policy requires the Cambria County Prison to have a staffing plan in compliance with the PREA standards and that the plan is reviewed annually. The facility has a staffing plan which was provided to this auditor. Documentation of annual review of the plan was also provided. Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 3, requires unannounced rounds. This auditor was provided documentation of these rounds and interviews with supervisory staff confirmed that they occur. There is a video surveillance system which provides video coverage of all housing units, program areas and hallways. The system has a video retention period of at least 45 days. Unannounced rounds are supplemented with random video reviews by supervisors. Observed staffing during the on-site audit demonstrated compliance with the staffing plan during program hours. Over-night staffing in compliance with the staffing plan was documented on staffing schedules, housing unit logs as well as interviews with staff. There were no instances of deviations from the staffing plan due to training, vacations, Family Medical Leave and other types of leave. Overtime is paid to maintain minimum staffing.

Standard 115.14 Youthful inmates

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Youthful Offenders", pages 1-2, meets the requirements of sight and sound separation on the housing unit and direct staff supervision off the housing unit when contact with other inmates may be possible. Youthful inmates were observed being housed on a separate unit. All four youthful inmates were interviewed by this auditor. Ages ranged from 16 to 17. Lengths of stay ranged from four months to one year. All four confirmed that they have been housed on their current cell block since their admission to the facility. All four acknowledged attending programs off their housing unit and the availability of off unit recreation.

Standard 115.15 Limits to cross-gender viewing and searches

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Per Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 3, prohibits male officers from conducting searches of any kind on female inmates. The female inmates interviewed reported that they have never been searched by a male staff while at the Cambria County Prison. All random staff interviewed confirmed that cross-gender searches of female inmates do not occur. All inmate interviewed denied ever having been searched by an opposite gender staff. Cambria County Prison "Sexual Abuse and Harassment", page 3 prohibits searching inmates for the purpose of determining if the inmate is transgender or intersex. All of the inmates interviewed denied ever being searched for this purpose. The corrections officers interviewed were aware that this type of search is prohibited. There are no cameras with a view inside bathrooms or showers. Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 3, provides for all inmate to shower privately. All inmate interviewed acknowledged that they have reasonable privacy when showering, toileting and changing clothes. All inmates interviewed acknowledged that opposite gender announce their presence when entering housing units. This practice was also observed throughout the on-site audit.

Standard 115.16 Inmates with disabilities and residents who are limited English proficient

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment" page 4 requires compliance with this standard. The facility has trained counselors within Inmate Services to assist disabled inmates in understanding their rights under PREA. The policy states on the same page that the use of inmate interpreters is prohibited except in an emergency. This auditor received copies of intake materials in Spanish. The facility has multiple Spanish speaking staff. A language interpretation service is available for all languages should the need arise. There were no inmates currently at the facility that required the services of an interpreter. There were no inmates currently at the facility that had disabilities that would require them to receive special services to understand their rights under PREA. All of the above was confirmed via interviews with staff, inmates and the mental health clinician.

Standard 115.17 Hiring and promotion decisions

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 4, requires compliance with this standard. These checks include clearance through the Pennsylvania child abuse registry. Material omissions of sexual abuse or harassment incidents or the provision of materially false information are grounds for termination. 26 new employees underwent background checks during this audit period. Documentation of clearances was provided to this auditor. Human Resources staff at Cambria County Prison confirmed the practice. The facility has not taken on any new contract employees during this audit period.

Standard 115.18 Upgrades to facilities and technologies

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

There have been no physical plant upgrades or renovations during this audit period. The facility is in the process of upgrading its video surveillance system. Upgrades will include the addition of 16 more cameras and swapping out the facility's older DVR's for NVR. Current retention time on the system for recorder images is on average 45 days. The upgrade to NVR's will insure a retention time for all cameras of at least 45 days.

Standard 115.21 Evidence protocol and forensic medical examinations

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment" page 4 and the Memorandum of Understanding with Victim Services Inc. of Cambria and Sumerset Counties were reviewed by this auditor. The policy addresses all aspects of this standard. There were two instances of sexual abuse or assault during this audit period and both victims received forensic examinations from a SANE. Forensic examinations are not conducted by facility staff. All staff are trained to preserve incident scenes and measures to prevent evidence from being destroyed. Physical evidence collection of criminal acts may be collected by staff in a manner consistent with municipal law enforcements practices. This was confirmed via interviews with staff. Criminal investigations are conducted by the Cambria County District Attorney's Office. There is an extensive protocol in place that was collaboratively developed with the District Attorney's Office, outside law enforcement and several community based victim advocacy groups.

Standard 115.22 Policies to ensure referrals of allegations for investigations

- ☒ Exceeds Standard (substantially exceeds requirement of standard)
☐ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 4 was reviewed by this auditor. This section of the policy meets all the requirements of this standard. It requires that all allegations of sexual harassment and sexual abuse be investigated. It requires that allegations that may be criminal in nature be referred to law enforcement and provides clear guidance for when Cambria County Prison may conduct an administrative investigation once a referral to law enforcement has been made. All Cambria County Prison staff are mandated reporters of sexual abuse and/or harassment and all staff interviewed were aware of their obligations to report sexual abuse and/or harassment under agency policy. The facility reported 12 allegations of sexual harassment, sexual abuse or sexual assault during this audit period. There were eight allegations referred to the law enforcement for investigation. Of the eight allegations referred for criminal investigation, four were accepted by law enforcement as possible criminal. Of those four all were deemed to be unfound after the investigation was completed. This was confirmed via email exchange with the investigating detective. Cambria County Prison policy requires reporting of sexual harassment allegations that do not rise to the level of sexual harassment as defined by the PREA standards (the standards specifically state "repeated" as a condition of the definition). Cambria County Prison as is intentionally reporting and investigating single occurrences of sexual harassment in order to improve the conditions of confinement at the facility as they relate to PREA compliance, and they should be applauded for their efforts. This practice clearly exceeds the requirements of this standard.

Standard 115.31 Employee training

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 7 requires all staff with contact with inmates to be trained as required in this standard. The training curriculum meets all aspects of this standard. This is the same curriculum used for refresher training. All staff interviewed acknowledged that they had received the initial training and refresher training. Documentation was provided to this auditor confirming staff's understanding of the material presented. All staff interviewed were aware of their obligations related to the agency's PREA policy, their obligations as mandated reporters of sexual abuse and/or harassment, their duties as a first responder and agency protocols related to evidence collection.

The training curriculum utilized by the facility meets all aspects of this standard as follows:

<input checked="" type="checkbox"/> (1) Agency's zero tolerance policy for sexual abuse and sexual harassment.	Pg. 3
<input checked="" type="checkbox"/> (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures.	Pg. 3-7
<input checked="" type="checkbox"/> (3) Inmates' right to be free from sexual abuse and sexual harassment.	Pg. 3
<input checked="" type="checkbox"/> (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment.	Pg. 3
<input checked="" type="checkbox"/> (5) The dynamics of sexual abuse and sexual harassment in confinement.	Pg. 3-5
<input checked="" type="checkbox"/> (6) The common reactions of sexual abuse and sexual harassment victims.	Pg. 4-5
<input checked="" type="checkbox"/> (7) How to detect and respond to signs of threatened and actual sexual abuse.	Pg. 3-7
<input checked="" type="checkbox"/> (8) How to avoid inappropriate relationships with inmates.	Pg. 1, 3 and 5
<input checked="" type="checkbox"/> (9) How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates.	Pg. 5
<input checked="" type="checkbox"/> (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.	Pg. 6

Standard 115.32 Volunteer and contractor training

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison, "Prison Rape Elimination Act Training for Volunteers and Contractors" was reviewed by this auditor. The training meets all the aspects of this standard. Volunteers and Contractors must sign an acknowledgement that they have received and understood the training. There contract mental health clinician was interviewed at the time of the on-site audit and acknowledged receiving the training. Documentation of signed acknowledgement was provided to this auditor.

Standard 115.33 Inmate education

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison's inmate education program is provided to inmates by a counselor from Inmate Services during the intake and classification process. Inmates receive materials about PREA and their rights to be free from abuse upon admission. There is a translation service available if the need arises. Counseling staff from Inmate Services have received specialized training to assist inmates with disabilities in understanding their rights under PREA. All inmates interviewed were aware of the right to be free from sexual abuse and harassment, and knew multiple means of reporting allegations of abuse. All but one inmate acknowledged receiving the inmate education and written materials. Posters were clearly visible on all living units and throughout the facility.

Standard 115.34 Specialized training: Investigations

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Per Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 4 Cambria County Prison does not conduct criminal investigations of sexual abuse and assault. Such investigations are conducted by detectives from the Cambria County District Attorney's Office. Cambria County Prison does conduct administrative investigations of sexual abuse and sexual harassment. Documentation of training for Cambria County Prison Investigator was provided to this auditor. A review of completed investigations demonstrated the investigator's full understanding of the training.

Standard 115.35 Specialized training: Medical and mental health care

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Response to Sexual Assault", page 1 mandates specialized training for medical and mental health staff as per the PREA standards. Documentation of training for contract providers was provided to this auditor. Interview with the Vice President of the contracted medical services provider confirmed staff training. Contract medical staff does not conduct forensic examinations or collect evidence. The agency's protocol is to preserve/avoid destruction of evidence and then transport to the designated medical facility (Conemaugh Memorial Medical Center).

Standard 115.41 Screening for risk of victimization and abusiveness

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Classification", pages 1- and address the standards related to screening inmates for risk of victimization and abusiveness. The PREA screening for risk of sexual victimization and/or propensity to victimize others is conducted by medical staff on the date of admission, and documented in the inmate management system. All inmates interviewed acknowledged being screened on the date of admission as well as being seen by medical staff on the date of admission. A complete classification assessment is completed by a Counselor from Inmate Services within 48 hours of admission. Both the screening and classification are performed using an objective, standardized instrument. Access to screening information is limited to medical staff, mental health clinicians and a limited number of upper level administrators. The screening instrument addresses all required elements of the standard.

Standard 115.42 Use of screening information

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Classification", page 2 addresses how the information obtained during screening is utilized to inform programming and housing decisions. Administrative Custody (as isolation is referred to at the prison), as it relates to this standard, was used twice during this audit period. A review of documentation of classification decisions and housing assignments clearly showed that the decisions are case-by-case, and that there is no designated unit for transgender or intersex inmates. Interviews with all staff and inmate confirmed compliance with this standard. Cambria County Prison Policy and Procedure 03.04.09 prohibits inmate from being assigned to a housing unit based on gender identity and prohibits gender identity from being used as a risk factor for abusiveness.

Standard 115.43 Protective custody

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Classification", page 2 addresses the use of protective custody. The provisions of the policy comply with this standard. A review of documentation of classification decisions and housing assignments clearly showed that the decisions are case-by-case, and involuntary protective custody is used only as last resort. Interviews with all inmates confirmed compliance with this standard. The vast majority of inmates in protective custody at Cambria County Prison are there at their own request (see inmate handbook). Involuntary protective custody was only used twice during this audit period and both instances were for less than 24 hours.

Standard 115.51 Inmate reporting

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 4, appropriately addresses this standard. All inmates interviewed knew at least two means to report sexual abuse or harassment (report to staff and Hotline via inmate telephone system were the most common responses). All knew where to find the Hotline number to report abuse outside the agency. None of the inmates interviewed had ever reported sexual harassment, sexual abuse or any form of abuse while in the Cambria County Prison. Inmates receive a handout at admission regarding how to report abuse and there are posters throughout the facility and on all housing units with the information. All staff are mandated reporters of abuse per Cambria County Prison Policy and Procedure "Response to Sexual Assault", page 4, and the laws of the Commonwealth of Pennsylvania. All staff interviewed were aware of their obligations as mandated reporters.

Standard 115.52 Exhaustion of administrative remedies

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Cambria County Prison inmate grievance process is not intended as a means to report allegations of sexual abuse, assault or harassment. While the PREA handout that inmates receive upon admission to the facility lists a grievance as one means of reporting sexual abuse or harassment, the grievance would automatically trigger the facility's PREA incident response plan. It would not be processed as a grievance; it would be treated as a written report of sexual abuse or sexual harassment. Therefore, under section (a) of this standard the agency is deemed exempt.

Standard 115.53 Inmate access to outside confidential support services

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

A Memorandum of Understanding with Victim Services Inc. of Cambria and Somerset Counties exists for the provision of these services. "Response to Sexual Assault", page 5 addresses access to these services. Interviews with medical and clinical staff confirmed that inmates would be advised about confidentiality prior to accessing the services. Victim Services Inc. advises that they provided services to one inmate during this audit period. Information is provided to inmates via posters that are on display in all housing units, the inmate handbook and the inmate education supplemental brochure. All of these contain the telephone number and mailing address for inmates to contact. All inmates interviewed acknowledged ready access to contact with their families (visiting and telephone calls) and the ability to contact their lawyer if they so desired.

Standard 115.54 Third-party reporting

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison's public website lists the hotline number to call if sexual abuse or harassment is suspected. All inmates interviewed acknowledged that they knew they could report abuse via a third party. All staff interviewed acknowledged that they would accept a third party report of abuse and respond in the same manner as if they had witnessed the abuse themselves.

Standard 115.61 Staff and agency reporting duties

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure "Sexual Abuse and Harassment", page 4 addresses the requirements of this standard. All staff and volunteers are mandated by policy to reporter any knowledge of sexual abuse or harassment. All staff and volunteers receive training as to how to fulfill their obligations as mandated reporters (what to report and how to report it). All staff interviewed were aware of the obligations as mandated reporters.

Standard 115.62 Agency protection duties

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure "Sexual Abuse and Harassment", page 2 addresses the requirements of this standard. There were no instances of an inmate being determined to be in substantial risk of imminent sexual abuse. All staff interviewed were able to articulate means that they would use to protect inmates should this occur.

Standard 115.63 Reporting to other confinement facilities

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure "Sexual Abuse and Harassment", page 5 complies with this standard. Cambria County Prison did not receive any reports of inmates being sexually abused at another confinement facility during this audit period and therefore had no documentation to show this auditor regarding such actions. Cambria County Prison did receive one report from another facility. Documentation of the investigation was provided to this auditor.

Standard 115.64 Staff first responder duties

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

All staff receive training regarding first responder duties. Cambria County Prison Policy and Procedure "Sexual Abuse and Harassment", page 5 complies with this standard. There were six instances of alleged sexual abuse during this audit period. Of those six, three instances involved staff separating victims from abusers and two involved collection of physical evidence. The facility's coordinated response plan was utilized in each instance. This plan meets all the requirements of standard 115.65. All staff interviewed were able to articulate their first responder duties.

Standard 115.65 Coordinated response

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

A copy of the facility's coordinated response plan was provided to this auditor. The plan provides clear and concise direction for response to any alleged PREA violation. Sample documentation of the plans use was reviewed by this auditor. The documentation provided shows clear evidence that the coordinated response plan was used. All staff interviewed were aware of their program's institutional plan and where to locate the document.

Standard 115.66 Preservation of ability to protect inmates from contact with abusers

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The collective bargaining agreement entered into by Cambria County on behalf of the Cambria County Prison and the United Mine Workers union was reviewed by this auditor. There is nothing in the contract that would violate this standard. Cambria County Prison Policy and Procedure "Sexual Abuse and Harassment", page 6 specifically authorizes Cambria County Prison to protect inmates from contact with alleged abusers and that termination is the presumptive discipline for sexual abuse of inmates.

Standard 115.67 Agency protection against retaliation

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure "Sexual Abuse and Harassment", page 5 names the Shift Commander as the person responsible for monitoring for retaliation against staff or inmates. Monitoring for retaliation is documented in the Shift Commander's report. There were no reports or complaints of retaliation during this audit period. Per interview with one of the Shift Commanders retaliation would be reported to the PREA Compliance Manager and the Deputy Warden. Appropriate measures would be taken to stop retaliation.

Standard 115.68 Post-allegation protective custody

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure "Sexual Abuse and Harassment", page 6 states that protective custody will only be used as a last resort. There were three instances of involuntary protective custody being used during this audit period and all were for less than 24 hours. In the event an inmate remains in protective custody for 30 days, the Program Review Committee is required to meet and review that decision.

Standard 115.71 Criminal and administrative agency investigations

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison does not conduct criminal investigations of sexual abuse and/or sexual assault. Those are conducted by detectives from the Cambria County District Attorney's Office. Cambria County Prison Policy and Procedure "Sexual Abuse and Harassment", page 6 complies with this standard relative to administrative investigations. Cambria County Prison investigators completed specialized PREA investigations training and follow the protocols there in when conducting investigations related to allegations of sexual harassment. Documentation of this training was provided to this auditor. A review of prior sexual harassment investigation reports confirmed the investigators' understanding of this policy and their training. Per email contact with a detective from the DA's office, four allegations of sexual abuse were investigated during this audit period. All four were deemed unfounded after the completion of the investigation.

Standard 115.72 Evidentiary standard for administrative investigations

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Per Cambria County Prison Policy and Procedure "Sexual Abuse and Harassment", page 6 a preponderance of evidence is the standard. A review of administrative investigation reports for alleged sexual harassment confirm the evidentiary standard is being followed.

Standard 115.73 Reporting to inmates

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure "Sexual Abuse and Harassment", page 6 meets the requirements of this standard. Documentation of reports to inmates was provided to this auditor. The documentation includes notification of the results of investigations conducted by the DA's office.

Standard 115.76 Disciplinary sanctions for staff

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure "Sexual Abuse and Harassment", page 6 addresses the requirements of this standard. There were no substantiated instances of sexual abuse, assault or harassment by Cambria County Prison staff occurring during this audit period, and therefore there was no documentation to review for compliance. Documentation was provided for an incident that occurred prior to this audit period.

Standard 115.77 Corrective action for contractors and volunteers

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure "Sexual Abuse and Harassment", page 6 addresses the requirements of this standard. There were no instances of sexual abuse, assault or harassment by contractors or volunteers occurring during this audit period, and therefore there was no documentation to review for compliance.

Standard 115.78 Disciplinary sanctions for inmates

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 6 and Cambria County Prison Policy and Procedure, "Disciplinary Procedure" address all required elements of this standard. Upon review, disciplinary sanctions for violations were commensurate with the severity of the incident.

Standard 115.81 Medical and mental health screenings; history of sexual abuse

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Response to Sexual Abuse", page 1 addresses the requirements of this standard. Inmate admitted to Cambria County Prison are seen by medical staff on the date of admission. Staff performing the inmate's intake utilize a standardized screening tool to determine if an inmate has any immediate and/or emergency medical or mental health needs. This instrument includes asking the inmate about prior sexual abuse. All inmates interviewed confirmed that they were seen by medical staff shortly after arrival at the facility. Interview with medical staff confirmed that screening includes history of sexual abuse. Per medical staff interviewed, inmates have access to all the same medical services available to inmate in the community. When a disclosure of prior abuse occurs, and services are offered by Medical and Mental Health staff, this is documented in the inmate's medical record.

Standard 115.82 Access to emergency medical and mental health services

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison's coordinated response plan addresses the requirements of this standard. Cambria County Prison Policy and Procedure, "Response to Sexual Assault", requires that the inmate's medical and mental health needs are met. The MOU with Victim Services Inc. and Cambria County Policy and Procedure, "Sexual Abuse and Harassment", clearly states that services will be provided to the inmate free of charge.

Standard 115.83 Ongoing medical and mental health care for sexual abuse victims and abusers

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

There were no incidents of sexual abuse or sexual assault occurring at Metro during this audit period and therefore there was no documentation to review. In the event that an incident was to occur the victim would receive services from the a community provider as outlined in the state-wide MOU. As previously noted, services from these providers are at no cost to the victim. All ongoing medical care beyond the scope of facility medical staff would be provided by community providers. The inmate would have the option of facility clinical staff or community providers for ongoing mental health services.

Standard 115.86 Sexual abuse incident reviews

- ☒ Exceeds Standard (substantially exceeds requirement of standard)
- ☐ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 6 requires that sexual abuse incident reviews occur. There were two instances of sexual abuse that were not deemed unfounded. Documentation of incident reviews for both instances were provided to this auditor. Both reviews were completed less than 30 days from when the investigation was completed.

Standard 115.87 Data collection

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 6 complies with this standard. Cambria County Prison also maintains electronic records for inmates and collects data on all allegations of sexual abuse using a standardized format. The form contains standardized definitions. Combined these systems allow Cambria County Prison to access data sufficient to complete the annual survey of sexual violence. The agency's public website was reviewed by this auditor. Aggregate data for Cambria County Prison is posted.

Standard 115.88 Data review for corrective action

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The agency's public website was reviewed by this auditor. The most recent, available annual PREA report was posted. The annual report addresses all elements of this standard. Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 6 addresses the retention requirements of this standard.

Standard 115.89 Data storage, publication, and destruction

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
☐ Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Cambria County Prison Policy and Procedure, "Sexual Abuse and Harassment", page 6 addresses the data storage requirements of this standard. A review of the data available on the Cambria County Prison website supports full compliance for this standard. There is no individual identifying information contained in the aggregate data or the reports related to the data posted.

AUDITOR CERTIFICATION

This auditor certifies that no conflict of interest exists with respect to his ability to conduct an audit of the Cambria County Prison.

Kurt Pfisterer/s/
Kurt Pfisterer, Dual Certified PREA Auditor

August 1, 2015
Date